

PHMSA Form 19 Question Set (IA Equivalent)
HAZARDOUS LIQUID INTEGRITY MANAGEMENT IMPLEMENTATION INSPECTION

Inspection ID:	6756		
Name of Operator:	Olympic Pipeline Company		
OPID No. 30781	Unit ID No. Intrastate Laterals		
HQ Address:	System/Unit Name & Address:		
M.C. 9S 30 S Wacker Drive Chicago, IL 60606	600 SW 39th Street, Suite 275 Renton, WA 98057		
Operator Official:	Gerald Maret	Address:	600 SW 39 th St Suite 275
Title:	President	City:	Renton
Phone:	6307302866	State:	WA
Emergency Phone/Cell:	8882718880 Renton Control Center	Zip Code:	98057
Persons Interviewed	Title		Phone No.
John Newhouse	DOT Compliance Specialist		3317023023
State Representative(s): Dennis Ritter		Inspection Date(s) November 14-15, 2016	
Records Location:		Renton, WA	

Unit Description:
Intrastate laterals: these include the Seattle lateral (12" line, 12.83 miles long), SeaTac lateral (12" line, 5.54 miles long), Tacoma lateral (8" line, 3.72 miles long), Olympia lateral (6" line, 14.9 miles long), and Vancouver lateral (12" line, 4.4 miles long). The Olympia lateral has been out-of-service since early 2009. The 6" pipeline was purged and filled with nitrogen gas at 13 psig pressure. A section of the Olympia lateral was removed for construction of a new road at approximately MP 12.2 88 th
Portion of Unit Inspected:
<p>Records were reviewed at Renton Station.</p> <p>Portions of all the laterals were inspected as noted in the Form R Field Notes as follows:</p> <p>Renton Station-signage, CP test point, atmospheric corrosion</p> <p>Seattle lateral- R/W, markings, signage, casing, check valve, CP test points, bridge crossing,</p> <p>Seattle DF-atmospheric corrosion, rectifier, Tank 102-coating, CP test reads, vents, nameplate, chime, site drainage</p> <p>Sea Tac lateral-R/W, markings, facility signage, CP test points, atmospheric corrosion, rectifier</p> <p>Tacoma lateral-R/W, markings, casing, facility signage, CP test points, bridge crossing, atmospheric corrosion, rectifier</p> <p>Tacoma Junction-signage, security, CP test point, rectifier</p> <p>Tacoma DF-signage, CP Test point, rectifier</p> <p>Olympia lateral: R/W, markings, casings, CP test point</p> <p>Vancouver lateral: R/W, markings, casings, facility signage, CP test points,</p> <p>Vancouver Junction- facility signage, CP test points, rectifiers</p> <p>Vancouver DF- signage, rectifier, Tank 107- coating, CP test reads, vents, nameplate, chime, site drainage, bonds</p>

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<p>Sat+ - Exceeds requirements/exemplary performance Sat – Meets requirements Con – “Concern” meets requirements, but is an area of recommendation and/or area that if not addressed may lead to non-compliance Unsat – Does not meet requirements N/A – Not Applicable N/C – Not Checked</p>
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Assessment and Repair - External Corrosion Direct Assessment (ECDA)

4. ECDA Indirect Examination (confirm) *Was the indirect examination performed in accordance with the operator's procedures and 195.588(b)(3)? (AR.EC.ECDAINDIRECT.O) (confirm)*

195.588(c) (195.452(j)(5)(iii))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

<p>Notes Do not use ECDA</p>

6. ECDA Direct Examination (confirm) *Was the direct examination performed in accordance with requirements? (AR.EC.ECDADIRECT.O) (confirm)*

195.588(b)(4) (195.452(j)(5)(iii))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

<p>Notes Do not use ECDA</p>

7. Post Assessment (detail) *Do records indicate that requirements were met for post assessment? (AR.EC.ECDAPOSTASSESS.R) (detail)*

195.589(c) (195.588(b)(5); 195.452(j)(3); 195.452(j)(4))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

<p>Notes Do not use ECDA</p>

Assessment and Repair - In-Line Inspection (Smart Pigs)

9. IMP Baseline and/or Continual Assessments Prioritized Assessment Schedule

(detail) Does a review of records indicate that continual assessments are implemented as specified in the plan?
(AR.IL.ASSESSCHEDULE.R) (detail)

195.452(l)(1)(ii) (195.452(b)(5); 195.452(c); 195.452(d);
195.452(f)(2); 195.452(f)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

All laterals: Seattle, SeaTac, Tacoma, Olympia (idled) and Vancouver are on the same schedule as mainline assessments. They were all assessed annually from 2000 to 2003, then put on a 5 year window starting in 2005.

13. Integration of ILI Results with Other Information (confirm) Did the operator integrate other data/information when evaluating tool data/results in the records reviewed? (AR.IL.ILIINTEGRATION.R) (confirm)

195.452(l)(1)(ii) (195.452(g))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

OPL integrity specialist compares previous tool runs with latest (tool vendor does the same) and also uses RAID (reassessment interval determination) process to integrate data. See results from latest OPL Field IMP Inspection 11/2016.

20. Compliance with ILI Procedures (detail) Have the ILI procedures been followed?

(AR.IL.ILIIMPLEMENT.O) (detail)

195.452(b)(5)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

Did not witness tool runs

Assessment and Repair - Integrity Assessment Via Pressure Test

4. Conduct of Pressure Tests (confirm) From the review of the results of pressure tests, do the test records validate the pressure test? (AR.PTI.PRESSTESTRESULT.R) (confirm)

195.452(l)(1)(ii) (195.452(f)(2); 195.452(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

No pressure testing

5. Conduct of Pressure Tests (confirm) *Was the pressure test conducted in accordance with procedures?*

(AR.PTI.PRESSTESTRESULT.O) (confirm)

195.452(j)(5)(ii) (195.452(c)(1)(i)(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No pressure testing

Assessment and Repair - Other Technology

2. Other Technology Process (detail) *From the review of selected integrity assessments results, do records show the assessments were performed in accordance with procedures and vendor recommendations?* (AR.OT.OTPLAN.R) (detail)

(AR.OT.OTPLAN.R) (detail)

195.452(l)(1)(ii) (195.452(j)(5)(iv); 195.452(f)(5))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No other technology used

3. Other Technology Process (confirm) *Has the process for the use of "Other Technology" been followed?*

(AR.OT.OTPLAN.O) (confirm)

195.452(j)(5)(iv)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No other technology used

4. Categorization of Defects (detail) *From the review of the results of selected integrity assessments, were defects identified and categorized within 180 days or other applicable timeframe?* (AR.OT.OTDEFECTCAT.R) (detail)

(AR.OT.OTDEFECTCAT.R) (detail)

195.452(l)(1)(ii) (195.452(f)(4); 195.452(h)(2))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No defects found with other technology

Assessment and Repair - Repair Criteria

3. Remedial Actions (IM) (detail) *Are anomaly remediation and documentation of remediation adequate?*

(AR.RC.REMEDIATION.O) (detail)

195.452(h) (195.402(a); 195.402(c)(14); 195.422(a); 195.569;
195.589(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Renton to Seattle lateral Site 001-003. All on Spokane River Bridge span. Repairs were a clockspring, Type B sleeve, and a recoat. All acceptable and adequate documentation of repairs.

Assessment and Repair - Repair Criteria (HCA)

2. Timely Discovery (detail) *From the review of the results of selected ILI and remediation projects, did*

discovery of all anomalies occur promptly, but no later than 180 days of completion of the assessment? (AR.RCHCA.DISCOVERY.R) (detail)

195.452(h)(2)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Baker Hughes tool recovered for Renton to Seattle on 12 Feb 15
Report from Baker Hughes dated April 2, 2015 within 180 days OK
Remediation occurred on Oct 10, Oct 14, Oct 14, 2015.

7. Pressure Reduction (confirm) *From the review of the results of ILI and remediation projects, was an*

acceptable pressure reduction promptly taken for each Immediate Repair condition or when a repair schedule could not be met? (AR.RCHCA.PRESSREDUCE.R) (confirm)

195.452(l)(1)(ii) (95.404(a); 195.404 (b); 195.452(h)(1)(ii);
195.452(h)(4)(i); 195.55(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Shut down line and reduced pressure from 600 psi (operating pressure) to 100 psi. See AR.RCHCA.DEFECTCAT.R below

PHMSA Form 19 Question Set (IA Equivalent)
HAZARDOUS LIQUID INTEGRITY MANAGEMENT IMPLEMENTATION INSPECTION

8. Categorization of Defects (confirm) From the review of the results of integrity assessments and remediation projects, were there any defects that were not properly categorized? (AR.RCHCA.DEFECTCAT.R) (confirm)

195.452(l)(1)(ii) (195.452(h)(4))

Sat+	Sat	Concern	Unsat	NA	NC
			X		

Notes
Renton to Seattle lateral Site 001. Tool called out 48% metal loss and vendor did not determine this was a required dig due to remaining wall thickness. OPL integrity specialist decided to dig anyway due to the change in metal loss from previous tool run in 2010. Actual metal loss was 90%. OPL immediately shut down pipeline as did not meet wall thickness to maintain MOP. Repair was a Type B sleeve. Tool miss called the defect due to corrosion byproducts (magnetite) being trapped against the pipeline by the failed tape wrap, masking the actual depth of corrosion. This particular anomaly was discussed with PHMSA personnel for causative corroboration and to see if any enforcement action was necessary. This was thought to be a rational explanation as to how the tool miscalled the anomaly. This particular segment of the line is over salt water and hanging on the underside of a bridge. The tape wrapped joints were improperly installed in 1994 when this line was rerouted. All the joints have been re-wrapped.
NOTE: this is checked "unsat" as the records show the tool did not adequately pick up the percentage of wall loss. However, this issue was resolved in 2015, so there will not be a finding from this inspection.

10. IM Schedule (detail) Do records demonstrate that the operator has met the schedule for remediating a condition in accordance with 195.452(h)(3)? (AR.RCHCA.IMSCHEDULE.R) (detail)

195.452(l)(1)(ii) (195.452.(h)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Baker Hughes tool recovered for Renton to Seattle on 12 Feb 15
Report from Baker Hughes dated April 2, 2015 within 180 days OK
Remediation occurred on Oct 10, Oct 14, Oct 14, 2015. Note this assumes the tool correctly called out the defect and the vendor/operator assigned the appropriate immediate, 60-d or 180-d designation. See 8. AR.RCHCA.DEFECTCAT.R Above.

11. Timely Remediation (detail) From the review of the results of selected ILI and remediation projects, were defects in segments that could affect an HCA remediated or dispositioned within the applicable mandatory time limits of 195.452(h)(4)? (AR.RCHCA.SCHEDULEIMPL.R) (detail)

195.452(l)(1)(ii) (195.452(h)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Baker Hughes tool recovered for Renton to Seattle on 12 Feb 15
Report from Baker Hughes dated April 2, 2015 within 180 days OK
Remediation occurred on Oct 10, Oct 14, Oct 14, 2015.
Note this assumes the tool correctly called out the defect and the vendor/operator assigned the appropriate immediate, 60-d or 180-d designation. See 8. AR.RCHCA.DEFECTCAT.R Above.

Assessment and Repair - Repair Criteria (O and M)

3. Remedial Actions (OM) (detail) Do the performance and documentation of remediation meet procedural requirements for non-IM repairs? (AR.RCOM.REMEDIATIONOM.O) (detail)

195.422(a) (195.422(b); 195.401(b)(1)195.402(a);
195.402(c)(14); 195.569; 195.579(c))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes

All repairs were in HCAs and therefore IM repairs. OPL's documentation of remediation was per their procedure.

Assessment and Repair - Repair Methods and Practices

2. Safety While Making Repair (detail) Are repairs made in a safe manner and to prevent injury to persons and/or property damage? (AR.RMP.SAFETY.O) (detail)

195.422(a) (195.402(c)(14))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Was on site for Renton to Seattle site 001-003. No issues.

4. Permissible Repair Methods (confirm) From the review of the results of integrity assessment and remediation projects, were all repairs performed in accordance with procedures and applicable sections of 49 CFR Part 195? (AR.RMP.METHOD.R) (confirm)

195.404(c)(1) (195.422(a); 195.422(b); 195.452(h)(1))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Exhibit RR1 of P195.422

5. Qualification of Personnel Performing Pipeline Repair (confirm) From the review of the results of integrity assessment and remediation projects, were personnel performing repairs, other than welding, qualified for the task they performed? (AR.RMP.REPAIRQUAL.R) (confirm)

195.505(b) (195.507(a); 195.505(c); 195.452(h)(1))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Reviewed personnel OQ on site for Renton to Seattle site 001-003.
Snelson:, Justin Johnson, Joseph Sanford-Coating removal, prep, repair
Snelson: Curtis Ary, Mike Whaley--welding
Applus/RTD: Ken Gula MT/UT NDE
TIR-Mark Skodje-xray technician

PHMSA Form 19 Question Set (IA Equivalent)
HAZARDOUS LIQUID INTEGRITY MANAGEMENT IMPLEMENTATION INSPECTION

6. Repair Records (confirm) *From the review of the results of integrity assessment and remediation projects and/or field observation, do repair records document all information needed to understand the conditions of the pipe and its environment and provide the information needed to support the Integrity Management risk model? (AR.RMP.PIPECONDITION.R) (confirm)*

195.404(c)(1) (195.404(c)(2))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Reviewed USPL DRW 010-005 Repair and Inspection Reports and Final Repair reports for Renton to Seattle Sites 001-003

7. Replacement Components (confirm) *From the review of the results of integrity assessment and remediation projects and/or field observation, were components that were replaced constructed to the same or higher standards as the original component? (AR.RMP.REPLACESTD.R) (confirm)*

195.422(b)

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
None.

9. Welder Qualification (confirm) *From the review of the results of integrity assessment and remediation projects, were repairs requiring welding performed by qualified welders using qualified welding procedures? (AR.RMP.WELDERQUAL.R) (confirm)*

195.214(a) (195.214(b); 195.222(a); 195.222(b);
195.452(h)(1))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
Snelson: Curtis Ary, Mike Whaley—welders. No issues

10. Repair of Weld Defects (confirm) *From the review of the results of integrity assessment and remediation projects, were weld defects repaired in accordance with 195.226 or 195.230? (AR.RMP.WELDQUAL.R) (confirm)*

195.226(a) (195.226(b); 195.226(c); 195.230(a); 195.230(b);
195.230(c); 195.452(h)(1))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
none

PHMSA Form 19 Question Set (IA Equivalent)
HAZARDOUS LIQUID INTEGRITY MANAGEMENT IMPLEMENTATION INSPECTION

11. Inspection of Welds (confirm) *From the review of the results of integrity assessment and remediation projects, were welds inspected and examined in accordance with 195.228 or 195.234? (AR.RMP.WELDINSPECT.R) (confirm)*

195.228(a) (195.228(b);195.234(a); 195.234(b); 195.234(c); 195.234(d); 195.234(e); 195.452(h)(1))

Sat+	Sat	Concern	Unsat	NA	NC

Notes
TIR-Mark Skodje-xray technician performed NDE testing of sleeve welds

13. Crack Repair Criteria (detail) *If the IM risk assessment and integrity assessments found cracks, SCC, or crack like features cracking to be a threat on pipeline segments, have remedial actions been taken to address integrity issues when assessment criteria have been exceeded? (AR.RMP.CRACKREMEDICATION.R) (detail)*

195.452(l)(1)(ii) (195.452(f)(3))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No cracks found

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Integrity Management - High Consequence Areas

3. IMP High Consequence Areas HCA Identification (confirm) *Do records show that locations and boundaries of HCA-affecting segments are correctly identified and maintained up-to-date? (IM.HC.HCALOCATION.R) (confirm)*

195.452(l)(1)(ii) (195.452(f)(1); 195.452(a); 195.452(b)(2); 195.452(d)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
The entirety of all four (five if include Olympia) lines are in HCAs. Confirmed this with maps and local knowledge.

4. IMP High Consequence Areas HCA Identification (detail) *Are locations and boundaries of segments that can affect HCAs correctly identified and maintained up-to-date? (IM.HC.HCALOCATION.O) (detail)*

195.452(b)(5) (195.452(a); 195.452(b)(2); 195.453(f)(1))

Sat+	Sat	Concern	Unsat	NA	NC

Notes
Confirmed HCA with maps and driving the pipeline routes

Integrity Management - Preventive and Mitigative Measures

2. P&M Measures Actions Considered (confirm) *Is there documentation of preventive and mitigative actions that have been considered and implemented? (IM.PM.PMMGENERAL.R) (confirm)*

195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(1); 195.452(i)(2))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes
 Reviewed pipeline P&M measures for all 4 lines.
 Include the following
 EFRDs
 Line repairs/rehab
 Coating repairs
 CIS
 Upgrade/enhance CP
 Additional patrolling
 Enhanced PA
 Soil Stabilization (>1" in 24 hrs additional patrolling)
 Leak detection
 Drill with emergency responders

3. P&M Measures Actions Implemented (detail) *Have preventive and mitigative actions been implemented as described in the records? (IM.PM.PMMIMPLEMENT.O) (detail)*

195.452(f)(6) (195.452(i)(1); 195.452(i)(2); 195.452(i)(3); 195.452(i)(4))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes
 Reviewed pipeline P&M measures for all 4 lines.
 Include the following
 EFRDs
 Line repairs/rehab
 Coating repairs
 CIS
 Upgrade/enhance CP
 Additional patrolling
 Enhanced PA
 Soil Stabilization (>1" in 24 hrs additional patrolling)
 Leak detection
 Drill with emergency responders

10. P&M Measures Leak Detection Capability Evaluation (detail) *Do records indicate that all required and other relevant leak detection evaluation factors have been adequately evaluated? (IM.PM.IMLEAKDETEVAL.R) (detail)*

195.452(l)(1)(ii) (195.452(f)(6); 195.452(i)(3))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes
 Laterals are part of CPM leak detection system

15. P&M Measures EFRD Need Evaluation (detail) *Have identified EFRD projects been implemented as planned?* (IM.PM.PMMEFRD.O) (detail)

195.452(i)(4)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
OPL PM Valve list: installed or converted since 1999.
Renton to Seattle installed 1 check valve MP 2.2 and converted 1 to MOV at MP 10.

Integrity Management - Quality Assurance

4. Performance Metrics (confirm) *Do records indicate that performance metrics are providing meaningful insight into integrity management program performance?* (IM.QA.IMPERFMETRIC.R) (confirm)

195.452(l)(1)(ii) (195.452(f)(7); 195.452(k))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
P195.452
IV.Performance Program Measures: includes Leaks number and volume, reducing leaks in facilities (most leaks are in facilities), spills, Activity measures-include (not all are listed here), ILI tool runs, digs, anomalies found/repaired, immediates/60d/180d, mileage assessed etc. All this information is compiled into IMP Annual Summary. Reviewed 2014 and 2015. Note-Spill volume reported in 2015 is lowest on record for BP--5.74 barrels. Metrics appear to be good indicators of IMP program and give a management the necessary information to assess performance and make necessary corrections. No issues noted.

Integrity Management - Risk Analysis

7. Risk Analysis Input Information (confirm) *Are conditions on the pipeline segments accurately reflected in the appropriate risk assessment data and information?* (IM.RA.RADATA.O) (confirm)

195.452(f)(3) (195.452(g))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes
For B31 8 and API 1160 threats reviewed listing of P&M measures considered (eg increased wall thickness for corrosion control our outside force). Then field inspected all laterals. Confirmed P&Ms are consistent with identified threats and appropriate.

Maintenance and Operations - Low-Stress Rural Pipelines

3. Categorizing Rural Low Stress Pipelines (confirm) *Are locations and boundaries of segments that can affect a USA correctly identified? (MO.LS.CATEGORIZATION.O) (confirm)*

195.12(b) (195.12(b)(1); 195.12(b)(2); 195.12(b)(3);
195.452(a))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
No low stress lines

Reporting - Notices and Reporting

5. Notifications (detail) *Has notification been made if Other Technology is used, technology is unavailable, the 5 year reassessment interval cannot be met, remediation schedule cannot be met and pressure cannot be reduced, or a pressure reduction exceeds 365 days? (RPT.NR.NOTIFICATIONS.R) (detail)*

195.452(l)(1)(ii) (195.452(m))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes
None used so no notifications.

Acceptable Use: Inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.